

## Crawford, Kristie

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**From:** tanner@keanelawllc.com  
**Sent:** Wednesday, October 2, 2024 5:23 PM  
**To:** Crawford, Kristie  
**Cc:** ryan@keanelawllc.com; nick@cliffordsaviolaw.com; matt@cliffordsaviolaw.com; Greenwood, Kelly  
**Subject:** RE: Friday Inspection - Francis v. Wausau Homes [BJPC-BJLIB.FID2157956]  
**Attachments:** Christopher Wilkens CV.pdf; CRW Expert Testimony History Sep 2024.pdf; 2024 JSH Non-Ins Rate Sheet - FA&E.pdf

**CAUTION:** External Sender

Kristie,

Mr. Wilkens' expected testimony in this case will include the following subject matters: construction and engineering standards, defects, deficiencies, improper work, deviations, and damage.

Mr. Wilkens is expected to opine that there were structural and engineering errors, deficiencies, and defects specific to the Francis house, including insufficient preparation and construction work, inferior construction methods, substandard workmanship, and improper and deficient construction and alignment of the foundation, structure, and components of the house. Mr. Wilkens will opine to a reasonable degree of professional certainty.

Attached is Mr. Wilkens' testimony history, CV, and rate sheet in advance of the deposition.

Best,

Tanner

**Tanner A. Kirksey**  
Associate Attorney  
Keane Law LLC  
7711 Bonhomme Ave, Ste 600  
St. Louis, MO 63105  
Ph: (314) 391-4700  
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**From:** Crawford, Kristie <kcrawford@bjpc.com>  
**Sent:** Wednesday, October 2, 2024 11:00 AM  
**To:** tanner@keanelawllc.com  
**Cc:** ryan@keanelawllc.com; nick@cliffordsaviolaw.com; matt@cliffordsaviolaw.com; Greenwood, Kelly <kgreenwood@bjpc.com>  
**Subject:** RE: Friday Inspection - Francis v. Wausau Homes [BJPC-BJLIB.FID2157956]

Thank you. That is very helpful.

Sorry to be a pest, but I also need the disclosure information required by Rule 26(a)(2)(C) regarding Christopher Wilkens, P.E. as soon as possible. If it is limited to his report, I just need you to confirm that. We cannot go through the inspection without knowing the subject matters of his testimony and a summary of his opinions.



**Kristie Crawford** | Principal  
300 John Q. Hammons Parkway, Suite 603  
Springfield, MO 65806  
417-831-1412  
kcrawford@bjpc.com

Website | Bio

**Mansfield Rule**  
Certified 2023-2024 DIVERSITY

**From:** tanner@keanelawllc.com <tanner@keanelawllc.com>  
**Sent:** Wednesday, October 2, 2024 10:24 AM  
**To:** Crawford, Kristie <kcrawford@bjpc.com>  
**Cc:** ryan@keanelawllc.com; nick@cliffordsaviolaw.com; matt@cliffordsaviolaw.com; Greenwood, Kelly <kgreenwood@bjpc.com>  
**Subject:** RE: Friday Inspection - Francis v. Wausau Homes [BJPC-BJLIB.FID2157956]

**CAUTION:** External Sender

31328 Lace Ave., Fairfax, MO 64446. If you need coordinates, 40°16'26.6"N 95°26'43.9"W should take you to the end of the driveway.

Tanner

**Tanner A. Kirksey**  
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**From:** Crawford, Kristie <[kcrawford@bjpc.com](mailto:kcrawford@bjpc.com)>  
**Sent:** Wednesday, October 2, 2024 10:11 AM  
**To:** [tanner@keanelawllc.com](mailto:tanner@keanelawllc.com)  
**Cc:** [ryan@keanelawllc.com](mailto:ryan@keanelawllc.com); [nick@cliffordsaviolaw.com](mailto:nick@cliffordsaviolaw.com); [matt@cliffordsaviolaw.com](mailto:matt@cliffordsaviolaw.com); Greenwood, Kelly <[kgreenwood@bjpc.com](mailto:kgreenwood@bjpc.com)>  
**Subject:** Friday Inspection - Francis v. Wausau Homes [BJPC-BJLIB.FID2157956]

Tanner – Please send me the address for the house. Can you also provide directions?

Thank you,

Kristie



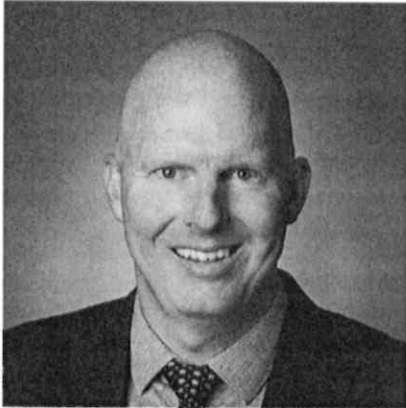
**Kristie Crawford** | Principal  
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### Education

MSCE, Structural Engineering, University of Kansas, 1999

BSCE, Civil Engineering, University of Kansas, 1997

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### Languages

English

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### Contact

13200 Metcalf Ave., Ste 265,  
Overland Park, KS 66213 |  
+1 913-375-5634 (M) |  
cwilkens@jsheld.com

### Summary of Experience

Mr. Wilkens' background encompasses matters of civil/structural engineering and building envelope systems. With twenty-three years in the engineering industry, his experience comprises structural design for new construction and addition/renovation projects, and forensic analysis of design, construction, or performance failures, and incurred damage to structural and building envelope systems.

In the forensic engineering arena, Mr. Wilkens has overseen and conducted evaluations involving damage and/or performance issues to residential, multi-family, and commercial-use buildings, and other structures such as agricultural buildings, docks/marinas, silos, tanks, towers, and billboards. Structural damage evaluations have included but are not limited to matters involving construction collapse, vehicle impact damage, fire and explosion damage, construction vibrations, moisture intrusion, and environmental loading from snow, ice, wind, seismic, and storm surge/flooding forces. Building envelope evaluations have included but are not limited to matters involving performance failures or damage from design or construction defects and exposure to wind, hail, or other environmental conditions. Mr. Wilkens has given expert witness testimony in support of arbitration and litigation proceedings.

In the structural design arena, Mr. Wilkens has overseen and conducted structural design and coordination with other design and construction disciplines for low- to mid-rise structures in mountain-resort development such as lodge/hotel buildings, mixed-use retail and condominium buildings, multi-family residential buildings, and single-family custom residences. Structural design projects have utilized a variety of construction materials including structural steel, cold-formed steel, cast-in-place concrete, precast concrete, reinforced concrete masonry, log and heavy timber, engineered wood, sawn lumber, and structural insulated panels.

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### Professional Licensure

See Mr. Wilkens' licensure beginning on page 2.

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### Professional Affiliations/Memberships

American Society of Civil Engineers, M.ASCE, since 2010

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### Role at J.S. Held

Mr. Wilkens leads the Property Group within the Forensic Architecture & Engineering practice at J.S. Held, consisting of Forensic Civil, Structural, and Geotechnical Engineers, Forensic Architects, Forensic Geologists, and other technical staff. Comprising approximately 80 professionals spanned across the United States, the Property Group conducts failure analyses for design, construction, and performance issues of vertical and horizontal construction, seismic risk assessments and seismic retrofit designs for existing buildings, materials failure analysis, and laboratory analysis for roofing materials.

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**Professional Licensure**

|                       |                                                                   |
|-----------------------|-------------------------------------------------------------------|
| PE 32707 / AL         | State of Alabama Engineering License                              |
| PE 15129 / AR         | State of Arkansas Engineering License                             |
| PE.0037738 / CO       | State of Colorado Engineering License                             |
| P22353 / IA           | State of Iowa Engineering License                                 |
| PE21632 / KS          | State of Kansas Engineering License                               |
| 29236 / KY            | State of Kentucky Engineering License                             |
| 49747 / MN            | State of Minnesota Engineering License                            |
| 2011026226 / MO       | State of Missouri Engineering License                             |
| PEL-PE-LIC-19989 / MT | State of Montana Engineering License                              |
| E-13705 / NE          | State of Nebraska PE License                                      |
| 20320 / NM            | State of New Mexico Engineering License (Past license - inactive) |
| PE.77638 / OH         | State of Ohio Engineering License                                 |
| 25701 / OK            | State of Oklahoma Engineering License                             |
| 29740 / SC            | State of South Carolina Engineering License                       |
| 10457 / SD            | State of South Dakota Engineering License                         |
| 108070 / TX           | State of Texas Engineering License                                |
| 43205-6 / WI          | State of Wisconsin Engineering License                            |
| PE12911 / WY          | State of Wyoming Engineering License                              |

**Work Experience**

J.S. Held, LLC

Senior Vice President

2020 – Present

Conducts engineering evaluations for the cause, extent, reparability, and expert witness testimony relating to a variety of failure modes and property damage. Responsible for supervisory oversight, technical guidance, and business management to a team of approximately 80 licensed engineers, architects, and forensic experts performing assignments concerning civil/structural/building envelope failures from design or construction defect, performance failure or incurred damage, seismic evaluations, building code evaluations, and materials failure evaluations.

Envista Forensics LLC

Technical Field Supervisor | Principal Consultant

2011 – 2020

Conducted engineering evaluations for the cause, extent, reparability, and expert witness testimony relating to property damages such as building collapse, fire, vehicle impact, water intrusion, and from environmental damage such as wind, hail, snow/ice, and storm surge. Mentored and developed staff engineers through training and technical review. Conducted educational technical presentations. Managed a team of engineers conducting civil/structural forensic engineering projects throughout a fourteen-state region in the Midwest and great plains areas. Conducted project and staff management, technical review, quality control, hiring and training, budgeting, and client management.

PT&C Forensic Consulting Services, P.A.

Senior Forensic Consultant

2010 – 2011

Conducted engineering evaluations for the cause, extent, and reparability relating to property damages such as building collapse, fire, vehicle impact, water intrusion, and from environmental damage such as wind, hail, snow/ice, and storm surge.



Wilkens Engineering LLC  
President/Principal Engineer  
2004 – 2010

Completed all aspects of structural engineering design and documentation and was engineer of record for approximately 68 million dollars of custom, high-end residential construction. Managed all aspects of the business including client management, project procurement and contract negotiation, engineering design and drafting, accounts payable and receivable, and dispute resolution.

Monroe & Newell Engineers, Inc.  
Project Engineer  
1999 – 2004

Conducted structural engineering design, coordination with other consultants, project delivery, and construction administration services for new construction of buildings. Oversaw preparation of CAD production by drafting team and communicated progress and status of projects with the principals of the firm. Completed most or all aspects of structural engineering design and documents for residential, low-rise commercial, and mid-rise commercial projects.

### **Select Project Experience**

**Ceiling Framing Collapse, Lincoln, Nebraska.** Evaluated the cause of a ceiling framing collapse within a commercial building that resulted in personal injury to an occupant below.

**Commercial Warehouse Collapse, Kansas City, Missouri.** Evaluated the cause of a catastrophic roof collapse to a pre-engineered metal building that had undergone a recent roofing recover.

**Hotel Cladding Failure, Kansas City, Kansas.** Evaluated the cause of delamination failures to adhered masonry veneer, interior moisture leakage, at a recently constructed four-story hotel.

**Theater Fire, Branson, Missouri.** Evaluated fire damage to a performing arts theater to determine the extent of structural damage, and the necessitated scope of associated structural repair.

**Middle School Roof Leakage, Detroit, Michigan.** Evaluated the cause of multiple areas of roof leakage to a middle school campus building that had occurred following a relatively recent roofing recover.

**Apartment Tower Building Envelope Leakage, Kansas City, Kansas.** Evaluated the cause of multiple areas of moisture intrusion through exterior walls at a recently constructed four-story mixed-use retail and apartment building. Evaluated multiple allegations of construction deficiencies by stucco and masonry sub-contractor.

**Commercial Office Building, Nashville, Tennessee.** Evaluated the cause of extensive moisture leakage through the roof of a commercial office building complex after record snowfall.

**Grocery Store Building, Coffeyville, Kansas.** Evaluated the partial collapse of a grocery store roof during a significant rainfall event, which occurred subsequent to a recent renovation of the building.

**Apartment Complex, Lawrence, Kansas.** Evaluated roofing and exterior cladding components for wind and hail damage to more than twenty buildings throughout an apartment complex.

**Hotel Building, Branson, Missouri.** Evaluated the extent of structural damage and cladding damage to a four-story hotel after exposure to an EF-2 tornado.

**Private Residence, Wichita, Kansas.** Evaluated structural distress to a custom residence reportedly caused by nearby earthquake activity in Oklahoma.

**Aerial Tramway, Estes Park, Colorado.** Evaluated the cause of structural failure to a steel-framed base tower supporting the suspended aerial cable tramway.

**Elementary School, Mitchell, South Dakota.** Evaluated the cause of delamination to recently installed terrazzo floor covering throughout the building.

**Fire Station, Evans, Colorado.** Evaluated alleged construction defects resulting in damage to the roof coverings and roof sheathing, as well as moisture intrusion to interiors.

**Hunting Lodge, Red Mesa, Colorado.** Evaluated cause of collapse under snow load to a pre-engineered metal building.

**Salt Creek Residence, Eagle, Colorado.** An 8,500 ft<sup>2</sup> custom residence requiring design and coordination of multiple structural systems including conventional wood lumber framing, heavy timber framing, log framing, structural steel, composite concrete/steel, and cast-in-place concrete. The foundation design consisted of approximately 100 drilled concrete piers to accommodate non-bearing expansive soils and significant lateral earth pressures.

**Duplex Residence, Aspen, Colorado.** Structural design for an 8,200 ft<sup>2</sup> custom primary/secondary unit residence designed with conventional wood framing, extensive heavy timber framing, and structural steel. The complex roof structure was supported primarily by site-built custom heavy timber wood trusses, which were designed with traditional timber joinery methods such as scarf joints and mortis and tenon joints.

**Wildridge Townhouses, Avon, Colorado.** Structural design for a 10,000 ft<sup>2</sup> renovation of an existing six-unit apartment building into four high-end custom condominium units. This project required an extensive structural re-design to reuse a maximum amount of existing structural steel framing while redirecting load paths to accommodate revised architectural layouts. A particularly complex part of the design was the conversion of a large existing crawlspace area into new interior space via extensive under-pinning of the existing foundation.

**Custom Residence, Cordillera, Colorado.** Structural design for a 6,800 ft<sup>2</sup> custom residence utilizing structural insulated panels (SIPs) for the exterior walls and roof. The structural design of the SIP panels was integrated into other common design elements such as conventional wood framing, heavy timber framing, structural steel framing, and concrete foundation construction.

**Lupine Drive Residences, Vail, Colorado.** Structural design for an 8,300 ft<sup>2</sup> custom duplex residence designed with a mix of heavy timber, conventional wood framing, structural steel, and concrete construction. Project site was located within an identified potential rock/mudslide path requiring design of an engineered landscape swale capable of reducing rock-fall velocity, and specific design and material selection on the upslope side of the structure to accommodate projected impact loading.

**Obermeyer Place, Aspen, Colorado.** Structural design for a 285,000 ft<sup>2</sup> mixed-use, multi-building, commercial/residential project designed with multiple structural systems: pre-cast concrete below grade parking garages, composite concrete/steel floor framing, and wood roof construction.

**Westwall Lodge, Crested Butte, Colorado.** Structural design for a 160,000 ft<sup>2</sup> condominium lodge with pre-cast concrete below-grade parking garage, composite concrete/steel framing, and steel roof framing.

**Private Residence, Bachelor Gulch, Colorado.** Structural design for a 10,000 ft<sup>2</sup> custom log home residence designed with post and beam timber framing and log wall construction.

### Select Specialized Training

"Investigation and Repair of Fire-Damaged Framing", ASCE, 2011

"Residential Roofing", Haag Education, 2011

"Joints in Buildings", ASCE, 2014

"Structural-Condition Assessment of Existing Structures", ASCE, 2015

"Xactimate Training", Eberl, 2016

"Commercial Roofing", Haag Education, 2019



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### **Speaking Engagements**

**"Ordinance or Law Insurance Coverage: Building Code Basics and Insurance Code Coverage"**. Amica Insurance. December 14, 2021. Co-Presenter with attorney from Sloane and Walsh, LLP.

**"Building Codes: Implications for Damage Repair"**. J.S. Held Client Webinar. November 18, 2021.

**"Residential and Commercial Roofing Damage Evaluation"**. Kentucky Claims Association. July 26, 2019.

**"Building Codes – Implications for Structural Damage Assessment and Repair Scopes"**. Greater Kansas City Claims Association. June 6, 2018.

**"Building Envelopes and Water Leaks"**. Greater Kansas City Claims Association. May 8, 2017.

**"Roofing Damage and Building Code Provisions for Structural Repair"**. Shelter Insurance. February 7, 2017.

**"Fire Damage Evaluation and Repair"**. Live Burn Event. September 15, 2016.

**"Residential and Commercial Roofing Systems"**. Farmers Insurance. March 5, 2013.

**"Engineers Road to the Courthouse"**. Chartis Insurance. November 1, 2012.

### **Testimony History**

Available at request.



**Christopher R. Wilkens, P.E. - Expert Witness Testimony History**  
*Current as of 9/24/2024*

| Date      | Type        | Case                                                                                      | Case No.              | Retained by | Jurisdiction                                              |
|-----------|-------------|-------------------------------------------------------------------------------------------|-----------------------|-------------|-----------------------------------------------------------|
| 8/29/2022 | Deposition  | Arete Property Services, LLC and Byron Bothwell vs. General Casualty Company of Wisconsin | 8:21-CV-00407-BCB-SMB | Defendant   | United States District Court for the District of Nebraska |
| 7/14/2017 | Deposition  | Wegner Management Group, LLC vs. State Farm Insurance Companies                           | LACV019784            | Defendant   | District Court for Shelby County, Iowa                    |
| 8/4/2016  | Deposition  | Annette and Michael Shotwell v. American Family Insurance Group                           | CI 15-139             | Defendant   | District Court of Washington County, Nebraska             |
| 6/2/2014  | Arbitration | Ficenec v. American Family Insurance Group                                                | 57-434-E-00145-13     | Defendant   | Omaha, Nebraska - American Arbitration Association        |
| 5/22/2012 | Trial       | Zoanni v. Mountain West Farm Bureau                                                       | DV-11-1223            | Defendant   | Yellowstone County Court, Montana                         |



## 2024 Rate Sheet and Other Charges

Professional fees are charged hourly in 1/10<sup>th</sup> of an hour increments and provided based upon the experience and qualification level required for a specific project. In the event a project proceeds to a Dispute Resolution and/or Appraisal process, those rates shall apply.

| <b>Forensic Architecture &amp; Engineering</b> | <b>Standard Rate</b> | <b>Dispute Resolution Rate</b> |
|------------------------------------------------|----------------------|--------------------------------|
| Senior Engineer                                | \$350 - \$560        | \$400 - \$560                  |
| Senior Architect                               | \$350 - \$520        | \$400 - \$530                  |
| Senior Geologist                               | \$340                | \$390                          |
| Professional Engineer                          | \$285 - \$330        | \$335 - \$380                  |
| Professional Architect                         | \$285 - \$330        | \$335 - \$380                  |
| Senior Project Manager                         | \$240 - \$360        | \$290 - \$410                  |
| Chemist                                        | \$265 - \$330        | \$315 - \$380                  |
| Professional Geologist                         | \$235 - \$265        | \$285 - \$315                  |
| Project Engineer                               | \$215 - \$245        | \$265 - \$295                  |
| Project Geologist                              | \$210                | \$260                          |
| Senior Technician                              | \$155 - \$170        | \$195 - \$210                  |
| Analyst                                        | \$130 - \$160        |                                |
| Technician                                     | \$115 - \$145        |                                |
| <b>Fire O&amp;C</b>                            |                      |                                |
|                                                | <b>Standard Rate</b> | <b>Dispute Resolution Rate</b> |
| Senior Investigator                            | \$180 - \$235        | \$260 - \$345                  |
| Investigator                                   | \$155 - \$175        | \$225 - \$250                  |
| Senior Technician                              | \$155                | \$155                          |
| Analyst                                        | \$145                |                                |
| Technician                                     | \$90                 |                                |

### Professional Fees - Expenses

#### File Administration

Each invoice includes four percent (4%) of professional fees to cover items such as in-house copies, postage, supplies, computers, software, technology, conference calls, and similar items.



|                                                                                                                                                                                |                                                    |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| Mileage                                                                                                                                                                        | Per Current I.R.S. Rate                            |
| Vendor and Subcontractor Expenses                                                                                                                                              | Cost Plus 10% or engagement specific agreed markup |
| Air Travel                                                                                                                                                                     | Cost                                               |
| Air travel is at coach fare considering one stop if cost savings vs. the related professional fees travel time. Officers travel business class for trips in excess of 4 hours. |                                                    |
| Meals per Diem                                                                                                                                                                 | \$90 per day                                       |
| Breakdown as follows: Breakfast \$20, Lunch \$30, Dinner \$40                                                                                                                  |                                                    |

Any amounts advanced by J.S. Held to subcontractors or other third parties shall be as a courtesy to Client, and Client shall be directly liable to such third parties for all such charges, costs, and expenses incurred.

Invoices are submitted on a monthly basis or sooner if concurrent with a key deliverable. Payment is due upon invoicing. Interest charges of 1% per month (12% APR) may apply for invoices not paid in full within 30 days of the invoice date. An election to forego charging interest shall not be considered a waiver to charge interest. Any invoices not disputed within 30 days shall be deemed accepted. Client is responsible for any required collection costs including reasonable attorneys' fees. J. S. Held may in its discretion suspend performance in the event of past due invoices. This schedule is subject to periodic revision.